



GE
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Transmitted via Overnight Courier

January 18, 2006

Mr. William P. Lovely, Jr.
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Newell Street Area II (GEC450)
Proposal for Additional Removal Activities**

Dear Mr. Lovely:

On December 20, 2005, the General Electric Company (GE) submitted a document titled *Subsurface Investigation Summary Report* (Subsurface Report) to the U.S. Environmental Protection Agency (EPA). That report summarized the results of recent subsurface investigations conducted by GE within the Newell Street Area II Removal Action Area (RAA) in response to the discovery of buried drums and capacitors during the performance of soil removal activities within portions of that RAA – notably, within City of Pittsfield Tax Parcel ID J9-23-8. The Subsurface Report summarized the completed activities (involving various geophysical surveys and a test trenching program) and indicated that GE would develop a proposed scope of work for additional removal activities within Parcel J9-23-8. This letter describes the additional removal activities proposed by GE to identify, and remove as encountered, buried drums and capacitors within the areas of Parcel J9-23-8 that have been subject to the recent investigations.

Although GE does not believe that the activities proposed herein are required by the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site, GE proposes to conduct these activities under the CD. In doing so, GE reserves the right to contend that any additional response actions at this RAA that go beyond those specified in the *Statement of Work for Removal Actions Outside the River* and in GE's *Final Removal Design/Removal Action Work Plan for Newell Street Area II* (Final Work Plan), as approved by EPA, are not required by the CD, and to contest any future directive to conduct such response actions.

A. Summary of Recent Investigation Activities

Between September 15 and November 22, 2005, GE conducted several subsurface investigations to assess the potential presence and extent of buried drums and capacitors within portions of this RAA. As described in the Subsurface Report, these investigations consisted of non-intrusive geophysical surveys, followed by test trenching activities based on the results of the geophysical surveys. Prior to their implementation, the proposed activities were presented to EPA for review and approval. During the field implementation of the investigations, EPA and/or EPA representatives were present on site to observe the work.

The geophysical surveys were conducted between September 15 and October 11, 2005, in accordance with a GE letter dated September 6, 2005 and an EPA letter dated September 14, 2005 conditionally approving the proposed survey activities. The geophysical surveys included electromagnetic and magnetometer surveys at Parcel J9-23-8 and parcels within the RAA adjacent to and west of that parcel where soil excavation activities were previously proposed by GE and approved by EPA. They also included performance of a ground-penetrating radar (GPR) survey at Parcel J9-23-8, based on the results of the other surveys. The results of the geophysical surveys identified several areas at Parcel J9-23-8 where subsurface anomalies (possibly representing the presence of metallic and other non-native materials) were detected. The survey results were used to identify locations for a subsequent test trenching effort, which was proposed by GE on October 31, 2005, and approved by EPA on November 9, 2005.

GE conducted test trenching activities at Parcel J9-23-8 between November 10 and November 22, 2005. The test trenching activities included the excavation of 18 trenches (shown on Figure 1) totaling approximately 1,000 linear feet. As described in the Subsurface Report, drum remnants (all but one of which were crushed and empty) and/or capacitors were observed in portions of 16 of the 18 trenches. Generally, the depth at which these materials were observed ranged from 0.8 feet to approximately 3.5 feet below the top of the trench. As explained in the Subsurface Report, the various depths of the trenching activities were reported in terms of the vertical distance as measured from the existing grade at that time, which represented subsurface conditions resulting from completed excavations conducted as part of the soil remediation specified in the Final Work Plan. The results of the test trenching activities served as the basis for the proposed scope for additional removal activities described in Part B below.

B. Proposed Additional Removal Activities

Using the information provided in Tables 3 through 20 of the Subsurface Report, several areas have been identified where drums and capacitors may be present within the subsurface materials beneath the current limits of excavation. As such, GE proposes to expand the test trenching activities previously conducted to further investigate the presence of buried drums and capacitors and to remove such items where encountered. As a starting point for the additional exploration/removal activities, GE identified several initial areas of excavation based on an examination of the above-referenced tables. Specifically, each table was reviewed to identify locations and depths where evidence of drums and capacitors was observed, whether in the excavated trench material or within the trench sidewalls. The areas subject to additional removal were developed by expanding the portions of each trench where such materials were noted by approximately 15 feet horizontally. (In some instances, these areas were combined to create a larger contiguous area.) As a result, seven discrete areas were identified for additional removal activities. These areas are shown on Figure 1 and are further described below. (These seven areas are different from the four GPR areas shown on figures in the Subsurface Report.)

Area 1: This area generally encompasses the portion of Test Trench No. 1 where some capacitors were observed to be present in the northern portion of the trench to a depth of approximately 1 foot below the top of the trench.

Area 2: This area encompasses all or portions of Test Trench Nos. 2 through 9, 11, and 12. Drums and/or capacitors were observed at various locations within each of these test trenches. The vertical extent of observed drums/capacitors generally extended to a depth of approximately 3 feet below the top of trench.

Area 3: This area generally encompasses Test Trench No. 10, where capacitors were observed to be present to a depth of approximately 2 feet below the top of the trench.

Area 4: This area includes a portion of Test Trench No. 13 where drums were observed to be present to a depth of approximately 4 feet below the top of the trench.

Area 5: This area generally encompasses Test Trench No. 14, where drums and capacitors were observed to be present in a portion of the trench to a depth of approximately 3 feet below the top of the trench.

Area 6: This area encompasses a portion of Test Trench No. 16 where a drum and capacitors were observed to be present to a depth of approximately 2 feet below the top of the trench.

Area 7: This area generally encompasses Test Trench No. 18, where drums were observed to be present to a depth of approximately 2 feet below the top of the trench.

Based on the above information, GE proposes to conduct initial soil removal activities throughout each of the areas referenced above and shown on Figure 1. Within these areas (and any other subsequent areas into which excavation activities may proceed as discussed below), GE will initially remove the clean backfill layer (approximately 12 inches thick) that was previously placed, and will set that material aside for reuse as backfill. Following removal of that backfill layer, it is anticipated that excavation within these areas will extend approximately to the depth at which buried drums and/or capacitors were observed, as noted above. After these initial excavations, the horizontal and vertical extent of additional soil removal will be based on visual observations made as the excavation activities proceed. Specifically, during such removal activities, subsurface conditions will be assessed through visual observation of the excavated materials as well as excavation bottom/sidewalls. If drums and/or capacitors are observed in the bottom or sidewalls of the excavation, the limits of excavation will be expanded as necessary within Parcel J9-23-8 to encompass the soils containing such items. However, in the event that excavation activities extend to areas where existing structures are present (e.g., tower foundations) and/or vertically to locations below the water table, GE will discontinue the removal operations. (Note that this is not expected to occur based on the results of test trenching activities.)

As the excavation activities proceed, the removed materials (excluding any intact drums) will be loaded directly into trucks for removal from the RAA and subsequent handling as discussed in Part C below. Intact drums will be segregated, overpacked, characterized, staged within Building 78, and subject to appropriate off-site disposal. Once drums and capacitors are no longer observed in the bottom or sidewalls, excavation activities will be discontinued and the excavated area will be backfilled with clean material. The final limits of removal (horizontal and vertical) within each removal area will be documented through survey activities.

The additional removal activities described above will be conducted by the current Remediation Contractor, and all existing site monitoring and control activities performed by GE or its contractors will be maintained during these activities, including site security, health and safety provisions, air monitoring, erosion control, equipment cleaning, provisions for handling drums, etc.

C. Material Handling and Disposition

In preparation for conducting the additional soil removal activities summarized above and to supplement the existing soils data and prior characterization activities, GE conducted characterization sampling to assist in determining potential disposal options for the excavated materials. Sampling activities included the collection of various samples within areas that could potentially be subject to additional soil removal, and analysis of those samples via the Toxicity Characteristic Leaching Procedure (TCLP). The analytical results indicated that certain of the soils to be excavated would be considered a characteristic hazardous waste under the Resource Conservation and Recovery Act (RCRA).

As indicated above, excavated materials (excluding any intact drums, which will be separately disposed of off-site) will be directly loaded into trucks. These materials will be transported to Building 68 within the GE facility for temporary consolidation. In the CD (Appendix D, pp. 40-41), EPA determined that the entire GE-Pittsfield/Housatonic River Site is a single Area of Contamination (AOC) for purposes of the RCRA requirements, such that the design and operating requirements of EPA's RCRA regulations in 40 CFR Parts 264 and 265 do not apply to movement and consolidation of wastes within this AOC. Instead, these consolidation activities will be subject to EPA approval in connection with the specific work plans for such activities. In this case, materials within Building 68 will be placed on and covered with high density polyethylene (HDPE) with a thickness of 12-mil. In addition, GE will place appropriate signage outside of Building 68 and conduct weekly inspections of the stockpile(s) during the temporary consolidation of wastes within that building. All stockpiled materials will be removed from Building 68 as promptly as practicable, given the availability/capacity of the off-site disposal facilities to receive the excavated materials. It may be necessary to screen certain of the excavated materials to remove capacitors and capacitor parts depending on the selected off-site disposal facility(ies). In that case, such screening will be performed within Building 68.

GE is currently evaluating appropriate off-site disposal locations for these excavated materials and will notify EPA once determined.

D. Schedule

GE anticipates that the additional removal activities described herein can be initiated and completed within the four to six weeks after EPA approval of this proposal. This timeframe may be extended based on the availability/capacity of the off-site disposal facilities to receive the excavated materials and/or winter weather conditions. GE will continue to maintain its frequent communications with EPA regarding the implementation schedule.

Please contact me if you have questions or comments concerning the activities described above.

Sincerely,



Andrew T. Silfer, P.E.
GE Project Coordinator

Attachment

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